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June 8, 2020

**VIA ELECTRONIC FILING**

Hon. Andrew T. Baxter  
U.S. Magistrate Judge  
U.S. District Court, Northern District of New York  
Federal Building and U.S. Courthouse  
P.O. Box 7396  
Syracuse, New York 13261-7396

Re: *John Doe v. Skidmore College*  
*Case No. 1:20-cv-00008 (LEK/ATB)*

Dear Judge Baxter:

As you know, our firm represents Defendant Skidmore College in the above-referenced matter.

On consent of all parties, we respectfully submit a proposed protective order in the above matter. If the attached meets your approval, we respectfully request the Court "So Order" the proposed Confidentiality and Protective Order.

Thank you for your courtesies and consideration in this matter.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

s/Robert F. Manfredo  
Robert F. Manfredo, Esq.  
Bar Roll No. 515487